

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 4:19 CR 951 RLW NCC
v.)	
)	
BOBBY LEE JONES, JR.,)	
)	
Defendant.)	

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Thomas J. Mehan, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with being a felon in possession of a firearm in violation of Title 18, Section 922(g).
2. Pursuant to Title 18, United States Code, Section 3142(g), this Court should consider:
 - (a) the weight of the evidence against defendant;
 - (b) the defendant's history and characteristics; and
 - (c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/Thomas J. Mehan
THOMAS J. MEHAN, #28958MO
Assistant United States Attorney